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15 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

16 CHARLOTTE BOWNES; JOSEPH  
17 LAGRECA; JESSICA NAUMANN; and  
CHRISTOPHER GOODIN, individually and  
on behalf of all others similar situated,

18 Plaintiffs,

19 v.

20 INTERNATIONAL GAME TECHNOLOGY  
21 PLC; MGM RESORTS INTERNATIONAL;  
22 BALLY'S CORPORATION; PENN  
ENTERTAINMENT, INC.; STATION  
23 CASINOS, LLC,

24 Defendants.

Case No.: 3:24-cv-00528-ART-CSD

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR (1)  
PLAINTIFFS TO FILE AMENDED  
COMPLAINT; (2) DEFENDANTS TO  
RESPOND TO THE AMENDED  
COMPLAINT; AND (3) SET BRIEFING  
SCHEDULE ON DEFENDANTS'  
RESPONSIVE MOTION(S)**

**(THIRD REQUEST)**

Pursuant to LR IA 6-1, Plaintiffs Charlotte Bownes, Joseph Lagreca, Jessica Naumann, and Christopher Goodin, on one hand, and Defendant International Game Technology, PLC (IGT PLC)<sup>1</sup>, on the other hand, by and through their respective undersigned attorneys of record (collectively, the “Parties”), hereby stipulate and agree subject to the Court’s approval to extend the time for (1) Plaintiffs to file an amended complaint, (2) Defendants to respond to the amended complaint, and (3) set a briefing schedule on Defendants’ responsive motion(s). The current deadline for defendants, including IGT PLC, to respond is March 3, 2025. This is the third request for extension concerning this deadline.

1. On November 21, 2024, Plaintiffs filed their Complaint (ECF No. 1) against defendants, including Defendant IGT PLC (“Defendant”).
2. On November 25, 2024, Plaintiffs mailed a copy of the Complaint and Summons to a registered agent associated with IGT PLC (ECF No. 11).
3. On December 16, 2024, the Court approved an extension of time (ECF No. 19).
4. On January 22, 2025, the Court approved a second extension of time (ECF No. 26).
5. The current deadline for all defendants to respond to the Complaint (ECF No. 1) is March 3, 2025 (ECF No. 26).
6. Defendant contacted Plaintiffs to discuss its position that IGT PLC is an improperly named party. After conducting a meet and confer process, Plaintiffs have indicated that they intend to dismiss IGT PLC.
7. The other named defendants believe they are improperly named and counsel for proposed substitute defendants has contacted Plaintiffs. These discussions are ongoing and progressing.
8. Plaintiffs have stated that as a result of the meet and confer process they intend to amend the complaint. Counsel for IGT and counsel for the substitute defendants that have conferred with Plaintiffs have agreed to accept service of the amended complaint.
9. Subject to the Court’s approval, the Parties have agreed to the following schedule:

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<sup>1</sup>By entering into this stipulation, Defendant IGT PLC does not waive any arguments related to jurisdiction or any initial motion defenses.

- Plaintiffs shall file and serve their amended complaint on March 17, 2025;
- Defendants shall file and serve any responsive motion(s) on April 17, 2025;
- Plaintiffs shall file and serve any opposition to Defendants' responsive motion(s) on May 19, 2025; and
- Defendants shall file and serve any reply(s) in support of their responsive motion(s) on June 2, 2025.

10. During the requested extension, the parties intend to continue to finalize their meet and confer process regarding the named defendants. The requested extension is in the interest of judicial economy as continued conferral between the parties may eliminate or limit the need for certain motion practice. Further, due to the complexities of the issues raised in this matter and the number of parties involved in the action, the above briefing schedule will allow any additional parties to get up to speed.

11. Good cause exists to grant this stipulation and it is submitted in good faith, is not interposed for delay, and is not filed for an improper purpose.

DATED: February 14, 2025

DATED: February 14, 2025

/s/ Tyler K. Somes (with permission)

/s/ Carrie Dettmer Slye

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**IT IS SO ORDERED.**

**UNITED STATES DISTRICT JUDGE /  
UNITED STATES MAGISTRATE JUDGE  
Dated:**